

**FRIEDMAN LAW GROUP LLP**

270 Lafayette Street 14<sup>th</sup> Floor New York, New York 10012-3327  
tel. 212 680.5150 fax. 646 277.1151 [www.flglp.com](http://www.flglp.com)

March 3, 2011

Via ECF

The Honorable Ramon E. Reyes, Jr.  
United States Magistrate Judge  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *In re American Express Anti-Steering Rules Antitrust Litigation*,  
MDL No. 2221

Dear Judge Reyes:

At the conference yesterday, Your Honor asked if we are aware of any cases that are subject to the MDL transfer order in this case but that have not yet been transferred to this Court. To our knowledge, there is one such case: *National Supermarket Association, Inc. v. American Express Company, et al.*, 10-CV-04551 (SDNY) (the “NSA Case”), a class action on which we are counsel of record that challenges the anti-steering restraints of American Express. While the NSA Case was listed as a related case on filings before the Judicial Panel on Multidistrict Litigation, the docket for that case reflects that it has not yet been transferred to this District. We believe that the NSA Case should be transferred to this District and consolidated with the other class filings in MDL 2221. We do not understand either defendants or any of our co-plaintiffs to object to such a transfer.

Respectfully submitted,

s/ Tracey Kitzman

Tracey Kitzman

cc: All Counsel of Record via ECF